iPCB/TSCA Workshop Outcomes

1. **Technical Considerations:**
   a) Improve manufacturing processes to lower iPCB generation
   b) Develop alternative processes to reduce iPCBs (pigments, other sources?)
   c) Develop alternative pigments using non-chlorinated processes
   d) Evaluate Fate of PCB-11 (i.e.: in water, in fish, in humans, etc.)
   e) Pursue EPA risk assessment work

Commented [LDW1]: SRRTTF would not be directly involved. This requires working with manufacturers/industry

Commented [LDW2]: Not sure SRRTTF has the capability to affect change

2. **Market Drivers:**
   a) Corporate Market Drivers:
      i. Lower Procurement Limits (i.e.: 0.1ppm Apple & HP)
      ii. Change Pigment Use in products that don't need durability such as Newsprint
      iii. Printing Consultations to inform Clients of Consequences/Educate Supply chain
      iv. Reduction in Packaging and Graphic Printing
      v. Environmental Incentives resulting in "de-selection" (Intervene at a Brand Level)
      vi. Social media outreach by large corporations to brand themselves "sustainable" target circular economy

   b) Advocacy/Educational Market Drivers:
      i. Create database of alternative products
      ii. Change in market demand for color
      iii. Lower Procurement Limits Campaign (0.1 ppm, Apple & HP)
      iv. Raise Awareness beyond WA State:
         - Increase Public Awareness (Create Consumer Pressure)
         - Educate National Brands
         - Educate Supply Chains
         - National Media Campaign on iPCB implications

3. **Government/Regulatory:**
   a) TSCA/Regulatory Considerations:
      ~~i. Set a lower TSCA threshold for iPCBs (i.e.: 0.1 ppm)~~
      ~~Continued incremental TSCA allowance reductions~~
      ~~ii. Exclusion for Mono-, Di-Chlorinated iPCBs~~
      ~~ii. Exclusion for PCB-11~~
      ~~ii. Regulate only the 12 Dioxin like PCBs~~
      ~~ii. Congressional Oversight Hearing~~
      ~~ii. Federal (Government Accountability Office) Evaluation~~

Commented [LDW3]: SRRTTF has no capacity to affect

   b) Other Policies/Regulations:
      i. Require Certification of Products and/or Pigments
      ~~ii. Correct Policy Misalignment (TSCA/WQS/FDA…EU, EPA Multi Media?)~~
      iii. Enforcement, both Domestic & Foreign
      iv. Cradle-to-Grave Systems Maps (CAP continuation)
      v. Change WQS to Consider Congeners
      vi. Set Attainable Goals for Industry (Market Driven)
      ~~vii. Step-wise Regulation~~
      ~~viii.~~vii. Cost/Benefit Analysis to support regulatory change
      ~~ix.~~viii. Provide NPDES permit offsets or exclusions for inadvertent PCBs
      ix. Streamline approval/cost for new chemical products

Commented [LDW4]: This is an excellent suggestion, I'm just not sure how TF goes about it. Dr. Rodenberg has some interesting results from the effluent data.

~~4. Gary Jones (PRINTING United Alliance) Potential Projects for Consideration:~~

i. Continue testing water in the Spokane River and expanded it to address the data gaps regarding unknown sources of legacy PCBs and sources of inadvertent PCB's. The Task Force needs to understand all sources of the PCB load to the river and the contribution of each source in weight and volume.

ii. Conduct a review of the significant differences in test results between various government entities and industry to understand the basis for the differences in the methodologies for measuring results so that corrective actions can be developed to reduce or eliminate the inconsistencies.

iii. Review and revise the current understanding of the sources and magnitude of inadvertent PCB's, especially in light of the information presented at the workshop that indicated PCB-11 has several other pathways other than certain pigments that could allow it to be deposited into water bodies. Alternative pathways may exist for the other inadvertent PCBs and those need to be better understood.

iv. Explore how Washington State government can open a dialog with EPA to review its current regulatory framework for establishing alternative water quality standards for PCBs that do not appreciably bioaccumulate. Factors to be considered are the current global regulatory framework for inadvertent PCBs, BACT principles, and toxicity of the individual classes of PCB congeners.

v. Explore how Washington State can adopt EPA's recently promulgated water quality standards.

vi. Develop a white paper on the impact of EPA increasing the water quality standard for PCBs.

vii. Investigate specific requirements, effectiveness, limitations, and compliance determination with Lower Procurement Limits (i.e. 0.1 ppm Apple & HP). There needs to be a complete understanding if the procurement limits are aspirational or something that has been achieved in practice and how they are being enforced. It would be important to establish if third party or other testing being conducted to ensure conformance.

viii. Evaluate fate and toxicity of PCB-11 (i.e.: in water, in fish, in humans, etc.)